

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)	
WILLIAM H. OLIVER, JR. 2240 Highway 33 Suite 112 Neptune, New Jersey 07753 732-988-1500 Attorney for Debtor(s) WO-7129	
In Re: BETTY PINKSTON Debtors	Case No.: 18-20717 Adv. No: Hearing Date: July 10, 2018 @ 9am Chapter: 13 Oral Argument Requested if Objection Filed Judge: Michael B. Kaplan

**CERTIFICATION IN SUPPORT OF MOTION TO ALLOW DEBTOR TO HAVE
TWO (2) OPEN BANKRUPTCY CASES**

BETTY PINKSTON, hereby certifies and says:

1. I am the debtor in the above entitled matter and make this Certification in support of Motion to allow two (2) open bankruptcy cases.
2. I am 72 years old and presently working a full time job as a licensed practical nurse. I do receive a pension and social security.
3. I filed this bankruptcy in order to stop the sheriff sale of my home and to allow a Short Sale of the property. My understanding from the mortgage brokers is that if I do a Short Sale as opposed to having the house foreclosed, that I can obtain a mortgage in two (2) years after the Short Sale.

4. I wish to obtain a mortgage in two (2) years. I do have sufficient income and need a home for myself and my adult children who are presently living with me. We anticipate renting for two (2) years and then obtaining and buying another home.
5. I have completed my previous Chapter 13 plan which is under Case No. 15-17470 however I have been advised by the Chapter 13 Trustee that because not all the checks have been cashed by creditors, they cannot finalize what is necessary for me to obtain a discharge in that case.
6. The Trustee has filed with the Court a Plan Completion Letter so I have completed my plan and have done my debtor education so there is no reason why I should not receive a discharge in the first case.
7. Nevertheless, I do need the present bankruptcy to obtain a Stay on the foreclosure sale. In my present bankruptcy, I intend to pay 100% to creditors over the term of the plan. I am asking permission from the Court to allow me to file the second bankruptcy while the first bankruptcy is being discharged.
8. Based upon the foregoing, it is respectfully requested that an Order allowing debtor to have two (2) open bankruptcy cases be entered.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by the Court.

Dated: May 30, 2018

/s/ Betty Pinkston
BETTY PINKSTON, Debtor